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12 Attorneys for Defendant

13 UNITED STATES DISTRICT COURT
14 DISTRICT OF NEVADA

15 TARA GRANT,

16 Plaintiff,

17 vs.

18 KILOLO KIJAKAZI,
19 Acting Commissioner of Social Security,¹

20 Defendant.

21)
22) Case No.: 2:21-cv-00422-JAD-DJA
23)

24) **UNOPPOSED MOTION FOR EXTENSION OF**
25) **TIME TO RESPOND TO PLAINTIFF'S**
26) **MOTION TO REVERSE AND/OR REMAND**
27) **BASED ON NEW EVIDENCE**

28) **(FIRST REQUEST)**
29)
30)

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¹ Kilolo Kijakazi became the Acting Commissioner of Social Security on July 9, 2021. Pursuant to Rule 25(d) of the Federal Rules of Civil Procedure, Kilolo Kijakazi should be substituted, therefore, for Andrew Saul as the defendant in this suit. No further action need be taken to continue this suit by reason of the last sentence of section 205(g) of the Social Security Act, 42 U.S.C. § 405(g).

1 IT IS HEREBY REQUESTED, by Kilolo Kijakazi, Acting Commissioner of Social Security
 2 (Defendant), by and through undersigned counsel of record, that, with the Court's approval, Defendant
 3 shall have an extension of time of twenty-one (21) days to file a Response to Plaintiff's Motion to
 4 Reverse and/or Remand Based on New Evidence. Plaintiff appears to have filed duplicate copies of her
 5 Motion to Reverse and/or Remand Based on New Evidence on August 27, 2021 (Doc. 30) and August
 6 30, 2021 (Doc. 32). Thus, the current due date based on the initial filing on August 27, 2021 would be
 7 September 27, 2021, and the extended due date if granted would be October 18, 2021. This is
 8 Defendant's first request for an extension regarding filing a Response to Plaintiff's Motion to Reverse
 9 and/or Remand Based on New Evidence. Counsel for Defendant has consulted with Plaintiff regarding
 10 this extension and Plaintiff has no objection to this request.

11 Good cause exists for this request. Defendant respectfully requests this additional time because
 12 Counsel for Defendant has been unable to devote the time required to complete Defendant's response to
 13 Plaintiff's Motion due to his wife going into the hospital a week earlier than expected to give birth to his
 14 second child. The undersigned attorney will continue to be out on leave this week and then will return
 15 for a couple weeks to wrap up outstanding matters, such as filing the responsive brief in this matter
 16 before going out on paternity leave for a few months. It is therefore respectfully requested that
 17 Defendant be granted an extension of time to file the Response to Plaintiff's Motion to Reverse and/or
 18 Remand Based on New Evidence, through and including October 18, 2021.

19 Dated: September 27, 2021

CHRISTOPHER CHIOU
 Acting United States Attorney

20 /s/ Oscar Gonzalez de Llano
 21 Oscar Gonzalez de Llano
 22 Special Assistant United States Attorney

23 IT IS SO ORDERED:

24 
 25 UNITED STATES MAGISTRATE JUDGE

26 DATED: September 28, 2021

CERTIFICATE OF SERVICE

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 160 Spear Street, Suite 800, San Francisco, California 94105. I am not a party to the above-entitled action. On the date set forth below, I caused service of **UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFF'S MOTION TO REVERSE AND/OR REMAND BASED ON NEW EVIDENCE** on the following parties by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which provides electronic notice of the filing. Defendant also mailed a copy of the filing to the Plaintiff at:

Tara Grant
7380 S Eastern Ave
Unit 124-474
Las Vegas, NV 89123

I declare under penalty of perjury that the foregoing is true and correct.

Dated: September 27, 2021

/s/ Oscar Gonzalez de Llano
Oscar Gonzalez de Llano
Special Assistant United States Attorney